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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL GLENN WHITMORE,

Defendant.

) No. 3:21-cr-00038-SLG-DMS  
)  
) COUNT 1:  
) DISTRIBUTION OF CHILD  
) PORNOGRAPHY  
) Vio. of 18 U.S.C. § 2252A(a)(2),  
) (b)(1)  
)  
) COUNT 2:  
) POSSESSION OF CHILD  
) PORNOGRAPHY  
) Vio. of 18 U.S.C. § 2252A(a)(5)(B),  
) (b)(2)  
)  
) CRIMINAL FORFEITURE  
) ALLEGATION:  
) 18 U.S.C. § 2253 and 28 U.S.C.  
) § 2461(c)  
)  
)

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INDICTMENT

The Grand Jury charges that:

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### COUNT 1

On or about March 3, 2021, within the District of Alaska and elsewhere, the defendant, MICHAEL GLENN WHITMORE, did knowingly distribute any child pornography using any means and facility of interstate and foreign commerce and that has been mailed, and has been shipped and transported in and affecting interstate and foreign commerce, including by computer.

All of which is in violation of 18 U.S.C. § 2252A(a)(2), (b)(1).

### COUNT 2

On or about March 10, 2021, within the District of Alaska, the defendant, MICHAEL GLENN WHITMORE, did knowingly possess any computer disk and any other material that contains images of child pornography, which involved a prepubescent minor and minor who had not attained 12 years of age, that has been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, including by computer, and that was produced using materials that have been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All of which is in violation of 18 U.S.C. § 2252A(a)(5)(B), (b)(2).

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CRIMINAL FORFEITURE ALLEGATION

The allegations contained in Counts 1 and 2 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 2253 and 28 U.S.C. § 2461(c).

Upon conviction of the offenses in violation of 18 U.S.C. § 2252A(a)(5)(B), set forth in Counts 1 and 2 of this Indictment, the defendant, MICHAEL GLENN WHITMORE, shall forfeit to the United States pursuant to 18 U.S.C. § 2253 and 28 U.S.C. § 2461(c) his interest in any and all matter which contains visual depictions produced, transported, mailed, shipped, or received in violation thereof; any property constituting or traceable to gross profits or other proceeds the defendant obtained as a result of the aforementioned violation; and any and all property used or intended to be used to commit and to promote the commission of the aforementioned violation, including but not limited to:

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1. An Apple iPhone seized from his residence on March 10, 2021.

All pursuant to 18 U.S.C. § 2253 and 28 U.S.C. § 2461(c).

A TRUE BILL.

s/ Grand Jury Foreperson  
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GRAND JURY FOREPERSON

s/ Kyle Reardon  
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KYLE REARDON  
Assistant U.S. Attorney  
United States of America

s/ E. Bryan Wilson  
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E. BRYAN WILSON  
Acting United States Attorney  
United States of America

Date: March 16, 2021